

**ATTACHMENT A**  
**Statement of Facts**

*The United States and the Defendant, **ROMEO JOSEPH HILLMAN**, stipulate and agree that if this case proceeded to trial, the United States would prove the facts set forth below beyond a reasonable doubt. They further stipulate and agree that these are not all of the facts that the United States would prove if this case proceeded to trial.*

At all times relevant to this case, the Defendant, **ROMEO JOSEPH HILLMAN** (“**HILLMAN**”), was a resident of Rockville, Maryland.

On October 22, 2014, a Federal Bureau of Investigation (“FBI”) Task Force Officer acting in an undercover capacity downloaded 82 image and video files depicting child pornography from a computer using an IP address associated with the residence of **HILLMAN**. The images and videos depicted children from approximately ages three to 13 engaged in sexually explicit conduct. The following are examples of some of the downloaded files:

- **1117079252244.jpg** - an image file of a nude prepubescent girl sitting in the bathtub. An adult male is inserting his penis into the child’s mouth.
- **1118467948524.jpg** - an image file depicting a prepubescent girl with her legs spread. An adult male is pressing his penis against the child’s vagina.
- **aa(32).jpg** - an image file depicting a prepubescent boy leaning over an adult male whom is lying on his back. The adult male’s penis is inserted onto the male child’s mouth.
- **[B] man forced 3yo boy to fuck (1).wmv** – a video file depicting a nude adult male on top of, and in between the open legs of a nude prepubescent child. The adult male is simulating, or engaging in, sexual intercourse with the child.

On February 11, 2015, a search warrant was executed at **HILLMAN**’s residence. Law enforcement officers seized two laptop computers, four USB drives, and a cellular telephone. A subsequent forensic examination of the computers, USB drives, and cellular telephone revealed at least 12,765 images and 600 videos depicting child pornography. Of those files, at least 125 depict children previously identified as victims of child pornography by the National Center for Missing or Exploited Children. The images recovered included the images that were downloaded by the undercover officer in October 2014. Forensic analysis of **HILLMAN**’s Dell computer and cellular telephone confirmed that **HILLMAN** had a peer-to-peer (“P2P”) filesharing program loaded on his computer.

The images and videos recovered from **HILLMAN**’s Dell laptop, his USB drives, and his cellular telephone include depictions of sexual acts and/or bondage with boys and girls aged from infancy through pre-pubescent. The following are examples of images and videos recovered from the Dell laptop seized during execution of the search warrant:

- **[boy+man][toddler] XXXXXXBaby (15).jpg** – an image file depicting a nude male infant. An adult male’s penis is partially penetrating the infant’s anus.

- **1c2b3b1af.jpg** – an image file depicting an adult male lying on his back performing oral sex on a nude prepubescent female.
- **(Darkmatter)(Pthe) (Toddler) 3yr.avi** – a video file depicting a nude prepubescent female in the bathtub with a nude adult male. The adult male engages in anal sex with the female child and then ejaculates on the child's stomach.
- **[boy+man] VID\_20130613\_132622-1 toddler best.3gp** – a video file depicting a nude infant lying on its stomach next to a toddler wearing only a diaper. A nude adult male with an erect penis attempts to anally penetrate the infant while masturbating. The male turns the infant over on its back and inserts his erect penis into the infant's mouth while continuing to masturbate.

Forensic analysis of **HILLMAN**'s Dell laptop computer confirmed that **HILLMAN** discussed and traded child pornography and the sexual exploitation of minors through the a P2P filesharing program and Skype. **HILLMAN** used Skype from at least October 2012 through December 2014 to exchange messages regarding the sexual exploitation of children and to trade pictures and videos depicting child pornography. **HILLMAN** used multiple accounts and screen names on Skype. Several examples of chat messages between **HILLMAN** and other Skype users are below:

- On April 11, 2013, in response to the question “you collect pics?” from another Skype user, **HILLMAN** responded “tons u?” The other user then asked “how many do you have?” and **HILLMAN** responded “1000s of boys and girls.”
- On April 28, 2013, in the context of an exchange of messages on Skype regarding child pornography, **HILLMAN** wrote “how young? i got tons of pics/vids to trade.”
- On May 17, 2013, in the midst of an exchange of Skype messages regarding sexual experiences with minor boys, and in response to the question “got any vids,” **HILLMAN** responded “those are just starters and yes got loads of vids.” **HILLMAN** sent video files during that chat session.
- On October 8, 2013, another Skype user sent **HILLMAN** the following message: “I have mainly man/boy videos, some b/b but definitely prefer M/b - both fucking and oral videos, nothing forced though, not really into the hardcore stuff.” In response, **HILLMAN** wrote: “sounds good let’s trade.” **HILLMAN** and the other user subsequently traded numerous videos during that chat session.
- On June 17, 2014, a Skype user sent **HILLMAN** the message “want to trade vids” and to which **HILLMAN** responded “Sure hold on.” **HILLMAN** and the other user subsequently traded numerous videos during that chat session.

Images and videos distributed by **HILLMAN** depict real children engaged in sexually explicit conduct. **HILLMAN** downloaded and distributed images and videos of child

pornography using the Internet, and therefore such images and videos traveled in interstate and foreign commerce.

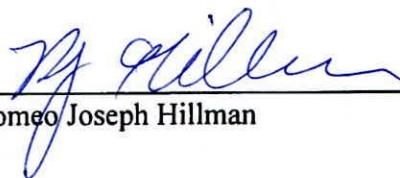
\* \* \*

I have read this Statement of Facts, and have carefully reviewed it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it. I acknowledge that it is true and correct.

11/30/2015

Date

Romeo Joseph Hillman



I am Romeo Joseph Hillman's attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is an informed and voluntary one.

11/30/15

Date

LaKeytria Felder, Esq.